

Patrick Morrissey

From: Monica Burkoth <burkothm@jbltd.com>
Sent: Friday, November 5, 2021 10:35 AM
To: Patrick Morrissey; Lisa M. McElroy; Samuel D. Branum; Miguel Larios (States Attorney)
Cc: Thomas Morrissey
Subject: RE: Mendoza v. Dart, Request for Conferral

We can be available on Tuesday.

From: Patrick Morrissey <pwm@morrisseylawchicago.com>
Sent: Thursday, November 4, 2021 11:51 AM
To: Monica Burkoth <burkothm@jbltd.com>; Lisa M. McElroy <mcelroyl@jbltd.com>; Samuel D. Branum <branums@jbltd.com>; Miguel Larios (States Attorney) <MIGUEL.LARIOS@cookcountyil.gov>
Cc: Thomas Morrissey <tgm@morrisseylawchicago.com>
Subject: Mendoza v. Dart, Request for Conferral

Counsel:

I write following the Court's order today regarding this case. Although we had a telephone conferral during the afternoon of 10/25, discussed plaintiff's concern with various objections to written discovery outlined in the status report filed on 10/29, and the parties were unable to reach any agreement on the written discovery, I write to schedule another phone conferral as soon as possible regarding these matters. Can you please provide availability either tomorrow or Monday for this conferral? If these dates do not work, please propose an alternative date.

Also, Miguel, we need dates for the depositions of the various Cook County employees outlined in the 10/29 status report.

I appreciate your prompt attention to this matter.

Pat

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